

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOSEPHINE KIRKLAND-HUDSON,

Plaintiff,

-against-

MOUNT VERNON CITY SCHOOL DISTRICT/  
BOARD OF EDUCATION; FELICIA GAON,  
Director of Student Services; SUSAN BURNETT,  
Special Education Supervisor; RACHEL DE PAUL,  
Assistant Director for Special Education;  
KARALYNE SPERLING, Special Education  
Supervisor; MARCIE E. TIGGS, Assistant  
Superintendent for Human Resources; and KENNETH  
R. HAMILTON, Superintendent of Schools,

Defendants.

**NOTICE OF MOTION**

**FOR LEAVE TO FILE**

**SECOND AMENDED COMPLAINT**

**21 Civ. 695 (KMK)**

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law in support of Plaintiff's Motion to Amend the Complaint pursuant to Rule 15(a)(2) and Rule 15(d) of the Federal Rules of Civil Procedure, and upon all pleadings and proceedings heretofore had herein, Plaintiff, Josephine Kirkland-Hudson, will move this Court before the Honorable Andrew E. Krause, United States Magistrate Judge, in the United States District Court for the Southern District of New York located at The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse, 300 Quarropas St., White Plains, NY 10601-4150, on such date and time as the Court sets, for an order granting Plaintiff leave to file the attached proposed Second Amended Complaint, and for such other and further relief that the Court deems just and proper.

Date: New York, New York  
March 28, 2022

Respectfully submitted,

**GLASS HARLOW & HOGROGIANLLP**

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By: s/ **Bryan D. Glass**  
BRYAN D. GLASS, ESQ.